## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

X

TELEBRANDS CORP.,

Plaintiff, : Civil Action No. 09 Civ. 1001 (NRB)

DEL LABORATORIES, INC.,
COTY US LLC and COTY INC.,

v.

Defendants.

Defendants.

#### THIRD AMENDED COMPLAINT

Plaintiff Telebrands Corp., for its Complaint against Defendants, Del Laboratories, Inc., COTY US LLC and COTY INC., alleges as follows:

#### THE PARTIES

- 1. Telebrands Corp. ("Telebrands") is a corporation organized and existing under the laws of the State of New Jersey, having a place of business at 79 Two Bridges Road, Fairfield, New Jersey 07004. Telebrands manufactures and sells a foot care implement, that is, a foot file, designated by the trademark PED EGG.
- 2. Upon information and belief, defendant Del Laboratories, Inc. ("Del Laboratories") is a corporation organized and existing under the laws of the State of Delaware and having a principal place of business at 726 Rexcorp Plaza, Uniondale, New York 11556.
- 3. Upon information and belief, defendant Coty US LLC ("Coty US") is a corporation organized and existing under the laws of the State of Delaware and having a principal place of business at 1 Park Avenue, 4<sup>th</sup> Floor, New York, New York 10016.

- 4. Upon information and belief, defendant Coty Inc. is a corporation organized and existing under the laws of the State of Delaware and having a principal place of business at 2 Park Avenue, 17<sup>th</sup> Floor, New York, New York 10016.
- 5. On information and belief, Del Laboratories, Coty US and Coty Inc. (collectively "Coty") sell a foot care implement designated "Pedi Perfect" which infringes trademark, trade dress and copyright of Telebrands in connection with the PED EGG product. Upon information and belief, Del Laboratories, Coty US and Coty Inc. reside within the State of New York and sell the Pedi Perfect product within this Judicial District

#### NATURE OF CLAIMS, JURISDICTION AND VENUE

- 6. This action arises under the Patent laws of the United States (35 U.S.C. §1 et. seq.), the Trademark and Unfair Competition laws of the United States (15 U.S.C. §§ 1051 *et seq.*), the Copyright laws of the United States (17 U.S.C. § 101 *et seq.*) and under the common and statutory laws of the State of New York (N.Y. Gen. Bus. Law §350, §360).
- 7. Jurisdiction of this Court is founded upon 15 U.S.C. §§ 1121 and 28 U.S.C. §§ 1331, 1332(a)(1), 1338(a) and (b), and the pendent jurisdiction of this Court. The matter in controversy exceeds \$75,000, exclusive of interest and costs.
- 8. Venue is proper within this Judicial District under 28 U.S.C. Sections 1391(b) and (c), and 1400(a) and (b).

### FACTS COMMON TO ALL CLAIMS FOR RELIEF

#### **Telebrands' PED EGG Product.**

9. Telebrands is a direct marketing company and, since 1987, has been engaged in the business of marketing and selling a wide variety of consumer products in this Judicial District and elsewhere,

principally through direct response advertising and through national retail stores. Telebrands is one of the recognized leaders in the direct response television marketing industry. Telebrands' success is based in part by expending a large amount of money advertising products on television for direct response orders. The television advertising creates a heightened brand awareness and recognition of the product among consumers who then purchase the product in retail stores.

- 10. Telebrands markets a product known as the PED EGG. The PED EGG product is a foot file designed to remove calluses and dead skin from a user's feet. The PED EGG foot file has a unique and distinctive product configuration and trade dress which is characterized, in part, by (a) a generally egg-shaped configuration; (b) a white color and (c) a curved profile along the lower side edge ("Product Trade Dress"). The arrangement and combination of these elements is arbitrary and fanciful and constitutes valid trade dress. Telebrands possesses exclusive rights to this Product Trade Dress. Photographs of the PED EGG product are attached as Exhibit A.
- 11. Telebrands' new, non-obvious and ornamental design of the PED EGG product is the subject of U.S. Design Patent No. D596,802 for a "Foot Micro File," which issued on July 21, 2009 ("Design Patent"), a copy of which is attached as Exhibit B. Telebrands is the exclusive licensee of the Design Patent, which is owned by International Edge, Inc.
- 12. Telebrands also is the exclusive licensee of U.S. Trademark Registration No. 3,633,750, issued on June 9, 2009, and owned by International Edge, Inc., for the PED EGG foot file product configuration trademark ("Trademark"). A copy of that U.S. Registration is attached as Exhibit C.
- 13. Telebrands rolled out the PED EGG foot file in October 2007, and sales grew rapidly. Telebrands sells the PED EGG product through direct response channels to the general consuming public throughout the United States and within this Judicial District. Telebrands also sells the PED

EGG product to consumers through major retailers, including Walgreens, CVS, Bed, Bath & Beyond and Target, throughout the United States and within this Judicial District.

14. The PED EGG is sold in packaging which has a unique and distinctive trade dress, as shown in the photographs attached as Exhibit D. The distinctive PED EGG packaging is characterized, in part, by (a) the PED EGG product is displayed through a clear blister package; (b) the printed backing has blue text on a white background with one yellow element; (c) the PED EGG logo with a foot silhouette is displayed on the left; (d) the metal filing cartridge is displayed through the clear packaging on the right; (e) a raised section extends across the bottom of the blister package; and (f) the raised section has a curved contour and displays content which repeats the blue and white color scheme ("Packaging Trade Dress"). The arrangement and combination of these elements is arbitrary and fanciful and constitutes valid trade dress. Telebrands possesses exclusive rights to this Packaging Trade Dress.

15. The packaging for the PED EGG product represents a wholly original work of authorship fixed in a tangible medium of expression and is copyrightable subject matter under the Copyright Law of the United States. U.S. Copyright Registration No. VA 1-629-218 duly issued for the PED EGG packaging and is valid and subsisting. A copy of the Certificate of Registration for the PED EGG packaging is attached as Exhibit E. Telebrands is the exclusive licensee under this copyright and has duly marked the packaging with a copyright notice.

16. Telebrands has expended millions of dollars advertising and promoting the PED EGG product on television, on the Internet and in print, most of which emphasizes the distinctive Trademark, Product Trade Dress and Packaging Trade Dress. As a result, the PED EGG has become a cultural phenomenon, spurring nearly 150 videos on You Tube and fan and parody spots on the

Internet and broadcast television. The PED EGG product has appeared and been featured on television including the well-known talk show The View, NBC, FOX and ABC News Reviews. Indeed, NBC's comedy show "Saturday Night Live" featured the PED EGG product in a skit about three female talk-show hosts who take a break from interviewing their guests to attend to pedicure activities. As a result of these substantial advertising and promotional efforts, Telebrands' sales of the PED EGG have been enormous. Telebrands has sold more than 10 million units of the PED EGG product in the United States, totaling more than \$100 million in sales, since rolling out the product in October 2007.

- 17. As a result of its extensive advertising and promotional activities which emphasize the distinctive Trademark, Product Trade Dress and Packaging Trade Dress, and further as a result of its substantial sales, the distinctive Trademark, Product Trade Dress and Packaging Trade Dress have become well and favorably known to the purchasing public and widely recognized as indicating the source or origin of the PED EGG product.
- 18. The Trademark and the Product and Packaging Trade Dress are fanciful, distinctive and well-recognized and represent substantial goodwill of Telebrands throughout the United States, including in this Judicial District.

#### **Defendant's Acts Of Infringement.**

19. On information and belief, Coty markets and sells beauty implements under the Sally Hansen LA CROSS brand. One such product which Coty is and has been marketing and selling within this Judicial District and elsewhere is a foot file called "Pedi-Perfect." The Pedi-Perfect foot file is a very close copy of Telebrands' PED EGG foot file and, without authorization from Telebrands, the Pedi-Perfect foot file incorporates the elements of Telebrands' distinctive Trademark and Product

Trade Dress, and embodies the invention claimed in the Design Patent. Photographs of Coty's Pedi-Perfect product, shown together with Telebrands' PED EGG product, are attached as Exhibit F.

- 20. Without authorization from Telebrands, Coty had access to and copied the copyrighted PED EGG packaging, and Coty sells its Pedi-Perfect product in packaging which incorporates the elements of Telebrands' distinctive Packaging Trade Dress and is substantially similar to the copyrighted work. Photographs of the packaging for Coty's Pedi-Perfect packaging, shown together with the packaging for Telebrands' PED EGG product, are attached as Exhibit G.
- 21. The Pedi-Perfect foot file is competitive with Telebrands' PED EGG foot file and, on information and belief, is sold to consumers through the same channels of trade, namely, through national retailers including Rite-Aid, Walgreens and Duane Reade.
- 22. By adopting and using Telebrands' Trademark and Product and Packaging Trade Dress, and by trading on Telebrands' valuable goodwill, Coty has caused and is likely to cause confusion, mistake and deception of purchasers and potential purchases as to the source or origin of the Pedi-Perfect foot file and as to the existence of an association, connection, or relationship between Coty and Telebrands.
- 23. Upon information and belief, Coty's adoption of the invention claimed in the Design Patent, as well as Telebrands' Trademark, Product and Packaging Trade Dress and copyrighted work is deliberate and intentional and with full knowledge of Telebrands' rights. Indeed, the packaging for the Pedi-Perfect product is different from the packaging which Coty uses for its other LA CROSS brand products. Pages from Coty's website showing its LA CROSS foot care products are attached as Exhibit H.
  - 24. Coty's actions have damaged and are likely to damage the superior reputation and goodwill

of Telebrands.

25. Telebrands is being irreparably injured and monetarily damaged by Coty's acts. Telebrands has no adequate remedy at law.

#### COUNT 1 -PATENT INFRINGEMENT OF U.S. D596,802

- 26. Telebrands repeats and realleges the allegations set forth in paragraphs 1-25 above, as though fully set forth herein.
- 27. This cause of action arises under Section 35 of the Patent Laws of the United States, 35 U.S.C. §§ 271 and 289.
  - 28. The Design Patent is valid and enforceable.
- 29. Coty has made, used, offered to sell, sold and/or imported into the United States, and still are making, using, offering to sell, selling, and/or importing into the United States, products having a design that infringes the claim of the Design Patent, without Telebrands' authorization or consent.
- 30. On inormation and belief, Coty's infringement has been intentional and willful, making this an exceptional case.
- 31. Coty will, on information and belief, continue to infringe upon Telebrands' rights under §§ 271 and/or 289 of the Patent Act, unless and until it is enjoined by this Court. Telebrands has been and is likely to continue to be irreparably injured unless Coty is enjoined. Telebrands has no adequate remedy at law.

#### **COUNT 2 – FEDERAL TRADEMARK INFRINGEMENT**

- 32. Telebrands repeats and realleges the allegations set forth in paragraphs 1-31 above, as though fully set forth herein.
  - 33. This cause of action is for federal trademark infringement and arises under Section 32(1) of

the Lanham Act, 15 U.S.C. § 1114(1).

- 34. By the acts alleged above, Coty has used in interstate commerce in connection with its goods, a reproduction, counterfeit, copy and colorable imitation of Telebrands' federally registered Trademark in connection with the sale, offering for sale, distribution and advertising of its goods in a manner that is likely to cause confusion, mistake or deception, in violation of 15 U.S.C. §1114(1).
- 35. Telebrands has been, is, and is likely to be irreparably damages by such acts, in an amount which cannot be determined without an accounting, and damage will continue unless defendant's acts are enjoined. Telebrands has no adequate remedy at law.

#### **COUNT 3 – FEDERAL UNFAIR COMPETITION**

- 36. Telebrands repeats and realleges the allegations set forth in paragraphs 1-35 above, as though fully set forth herein.
- 37. This cause of action is for unfair competition and arises under Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).
- 38. By the acts alleged above, Coty has used in interstate commerce in connection with its goods, false designations of origin and false descriptions and representations which misrepresent the nature, characteristics and qualities of those goods, in violation of 15 U.S.C. § 1125(a).
- 39. Telebrands has been, is, and is likely to be irreparably damages by the use of such false designations of origin and false descriptions and representations, in an amount which cannot be determined without an accounting, and damage will continue unless defendant's acts are enjoined. Telebrands has no adequate remedy at law.

#### **COUNT 4 – COPYRIGHT INFRINGMENT**

40. Telebrands repeats and realleges the allegations set forth in paragraphs 1-39 above, as

though fully set forth herein.

- 41. This cause of action arises under Section 501 of the Copyright Act of 1976, 17 U.S.C. § 101, et seq.
- 42. By the acts above alleged, Coty has infringed Telebrands' rights in U.S. Copyright Registration No. VA 1-629-218.
- 43. Coty's acts are and have been without Telebrands' authorization or consent, and are and have been willful.
- 44. Telebrands has and is being damaged by such acts, and damage will continue unless Coty's acts are enjoined. Telebrands has no adequate remedy at law.

#### **COUNT 5 – NEW YORK COMMON LAW UNFAIR COMPETITION**

- 45. Telebrands repeats and realleges the allegations set forth in paragraphs 1-44 above, as though fully set forth herein.
- 46. This cause of action is for unfair competition and arises under the common law of the State of New York.
- 47. Because of Coty's use of Telebrands' distinctive trademark and trade dress in the PED EGG product and its packaging, ordinary persons acting with reasonable care are likely to mistake Coty's goods for those of Telebrands.
- 48. Coty, through its unfair competition and false designations or origin, has unfairly competed with Telebrands by use of unfair and improper business practices, in violation of the common law of the state of New York.
- 49. Telebrands has and is being damaged by such acts, and damage will continue unless Coty's acts are enjoined. Telebrands has no adequate remedy at law.

#### COUNT 6 – NEW YORK STATUTORY UNFAIR COMPETITION

- 50. Telebrands repeats and realleges the allegations set forth in paragraphs 1-49 above, as though fully set forth herein.
  - 51. This cause of action is for unfair competition and arises under N.Y. Gen. Bus. Law § 360-o.
- 52. Because of Coty's use of Telebrands' distinctive and well-known trademark and trade dress, ordinary persons acting with reasonable care are likely to mistake Coty's goods for those of Telebrands.
- 53. Coty, through its trademark and trade dress infringement, unfair competition, false designations of origin and false descriptions and misrepresentations, has unfairly competed with Telebrands by use of unfair and improper business practices, in violation of N.Y. Gen. Bus. Law § 360-o.
- 54. Telebrands has and is being damaged by such acts, and damage will continue unless Coty's acts are enjoined. Telebrands has no adequate remedy at law.

#### **WHEREFORE**, Plaintiff demands judgment:

- a. Adjudging and decreeing that Defendants have unlawfully infringed Telebrands' design patent and registered trademark, misappropriated Telebrands' trade dress rights and infringed Telebrands' copyright;
- b. Preliminarily and permanently enjoining Defendants, their officers, agents, servants, employees and attorneys and all those in active concert or participation with any of them:
- 1. from importing, distributing, advertising, promoting, selling, and/or offering for sale a foot file substantially similar to the Design Patent, bearing the Trademark, the Product

Trade Dress, the Packaging Trade Dress or the copyrighted work associated with the PED EGG product and packaging, or any colorable variation thereof, unless the product emanates from or is authorized by Plaintiff; and

- 2. from falsely representing or suggesting that representing that Defendants' foot file is affiliated with, related to, or sponsored by Plaintiff or suggesting any connection with it;
- c. Requiring Defendants to pay its profits to Plaintiff, any damages sustained by Plaintiff as a result of Defendants' acts, and Plaintiff's costs for the action, and attorneys' fees, pursuant to 35 U.S.C. §§ 284, 289, 15 U.S.C. § 1117(a) and 17 U.S.C. §§ 504 and 505;
- d. Requiring Defendants to pay to Plaintiffs statutory damages, pursuant to 17 U.S.C. § 504(c);
- e. Requiring that all product labels, signs, prints, packages, wrappers, receptacles, and advertisements of Defendants bearing Plaintiff's Trademark, Product or Packaging Trade Dress, or copyrighted work, and any reproduction, counterfeit, copy, or colorable imitation thereof, and all plates, molds, matrices and other means of making the same, be delivered up to Plaintiff for destruction, pursuant to 15 U.S.C. § 1118 and 17 U.S.C. § 503;
- f. Requiring Defendants to pay to Plaintiff three times the amount of actual damages, and reasonable attorneys' fees, because of the exceptional nature of this case, pursuant to 35 U.S.C. § 285, 15 U.S.C. § 1117(a) and 17 U.S.C. § 505; and
  - g. Granting such other and further relief as this Court deems just and proper.

#### **JURY DEMAND**

Plaintiff Telebrands Corp. requests a trial by jury in this matter.

Dated: July \_\_\_\_, 2009

Respectfully submitted,

**COOPER & DUNHAM LLP** 

By:

Norman H. Zivin (NZ 6053) Wendy E. Miller (WM-1982) Tonia A. Sayour (TS-7208)

30 Rockefeller Plaza

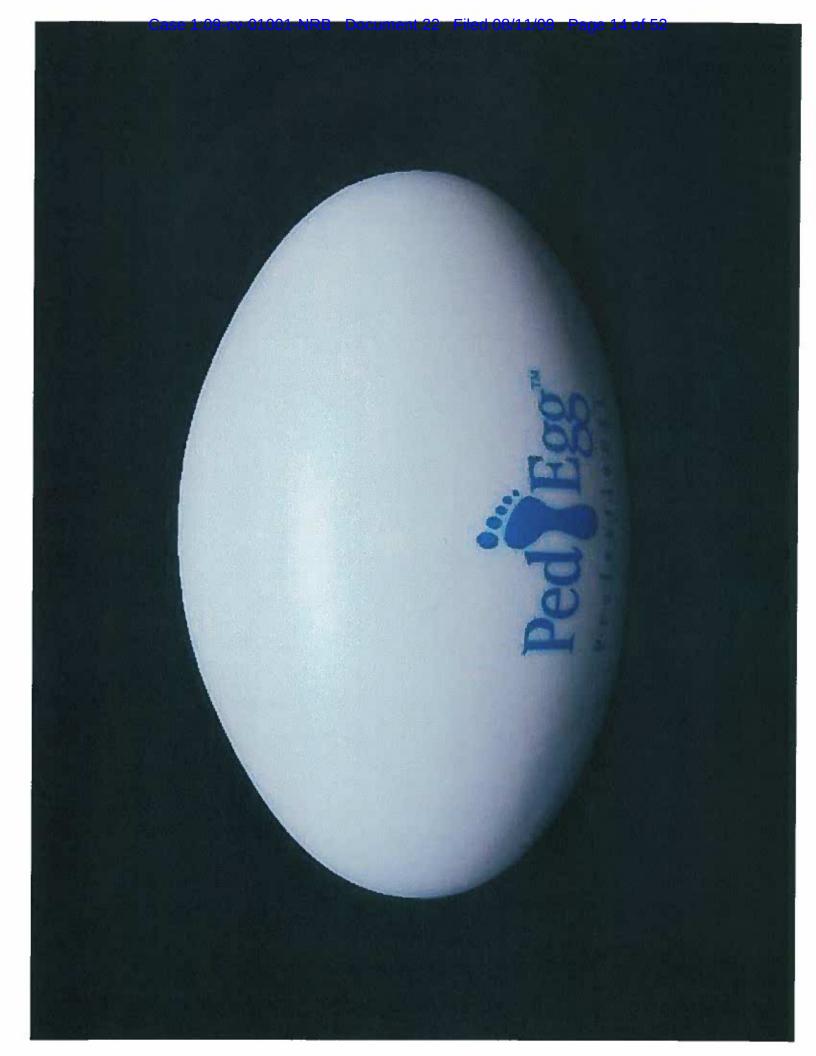
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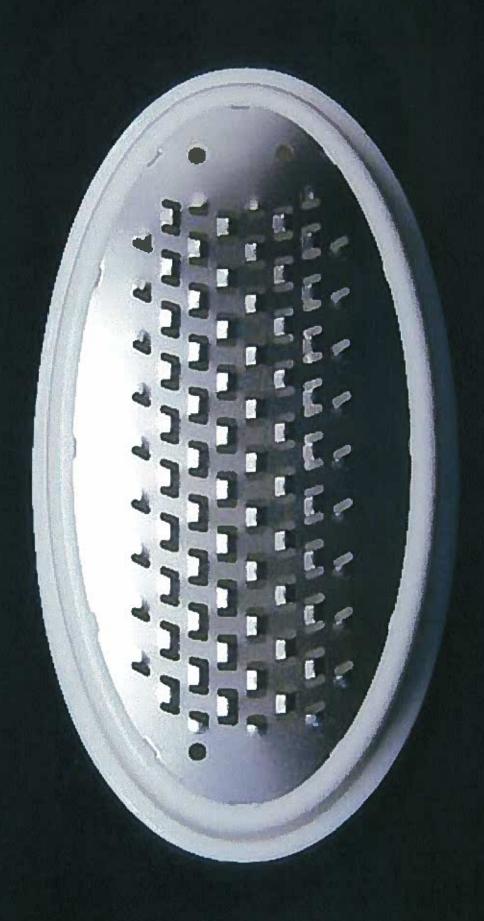
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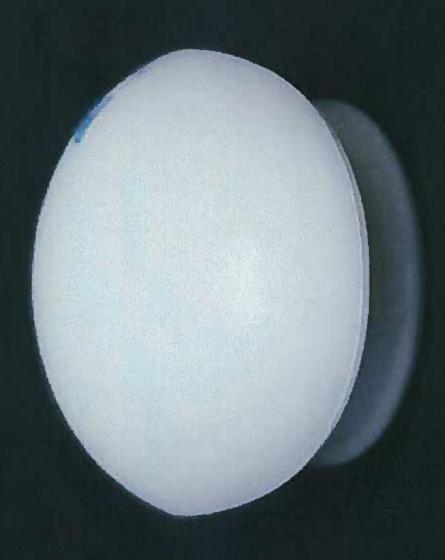
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Attorneys for Plaintiff

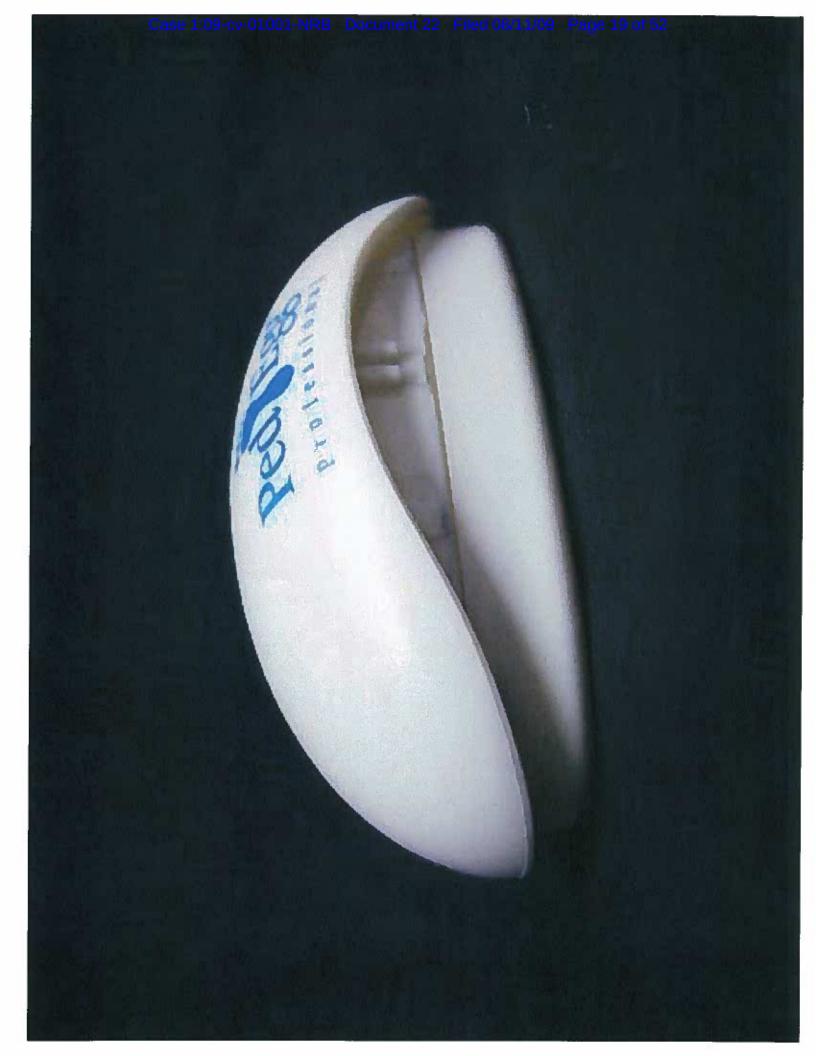
# **EXHIBIT A**











# **EXHIBIT B**

## (12) United States Design Patent Yang

#### (10) Patent No.: (45) Date of Patent:

**US D596,802 S** 

Jul. 21, 2009

#### (54) FOOT MICRO FILE

Inventor: Jun Yang, Zhejiang (CN)

Assignee: International Edge Inc., Fairfield, NJ

Term: 14 Years

Appl. No.: 29/308,976 (21)

(22) Filed: Jul. 17, 2008

#### Related U.S. Application Data

(63) Continuation of application No. 29/292,719, filed on Oct. 25, 2007, now abandoned.

#### (30)Foreign Application Priority Data

Sep. 14, 2007 (CN) ...... 2007 3 0309021

(51) LOC (9) Cl. ...... 28-03

(52) **U.S. Cl.** ..... **D28/59**; D24/147

(58) Field of Classification Search ...... D28/57, D28/59, 60; 132/73, 73.5, 75, 75.3, 75.4, 132/75.5, 75.6, 76.2, 76.4, 76.5; 30/26–29; D24/147; D7/678

See application file for complete search history.

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#### (Continued)

Primary Examiner—Jennifer Rivard (74) Attorney, Agent, or Firm—Cooper & Dunham LLP

#### **CLAIM**

The ornamental design for a foot micro file, as shown and described.

#### DESCRIPTION

FIG. 1 is a perspective view thereof;

FIG. 2 is a front view thereof;

FIG. 3 is a right side view thereof;

FIG. 4 is a rear view thereof;

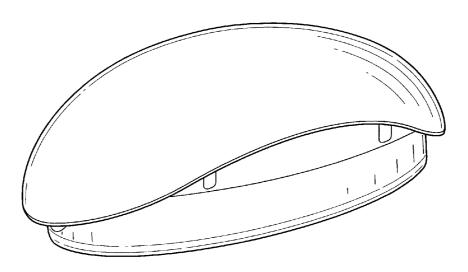
FIG. 5 is a left side view thereof;

FIG. 6 is a top view thereof; and,

FIG. 7 is a bottom view thereof.

The broken lines in FIG. 7 illustrate a portion of the foot micro file and form no part of the claimed design.

#### 1 Claim, 7 Drawing Sheets



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U.S. Patent Jul. 21, 2009 Sheet 1 of 7 US D596,802 S

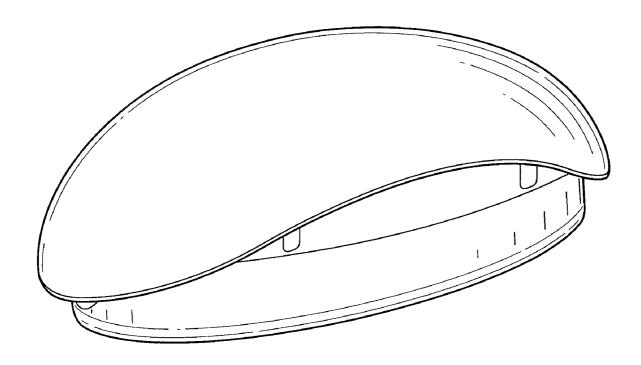


FIG. 1

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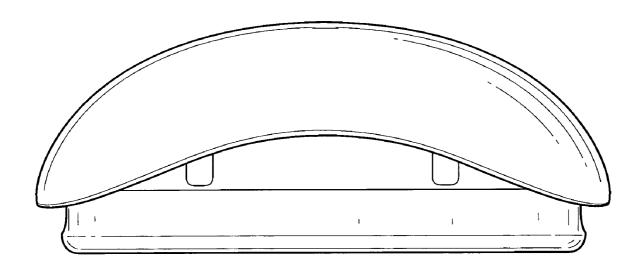


FIG. 2

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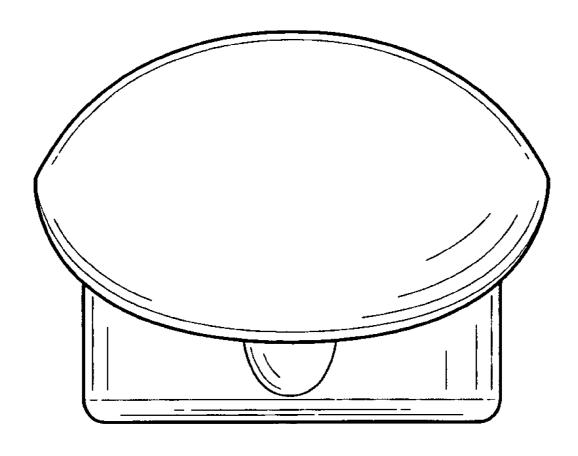


FIG. 3

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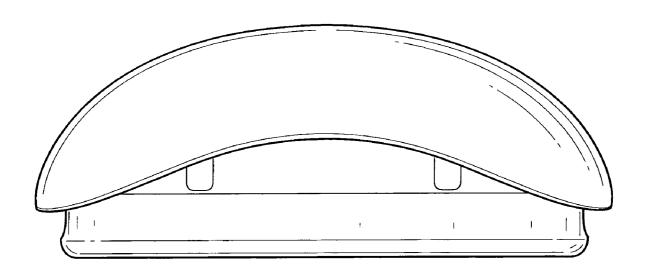


FIG. 4

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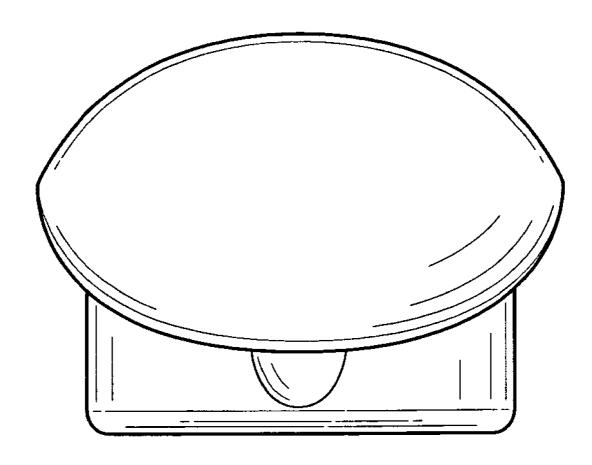


FIG. 5

Jul. 21, 2009

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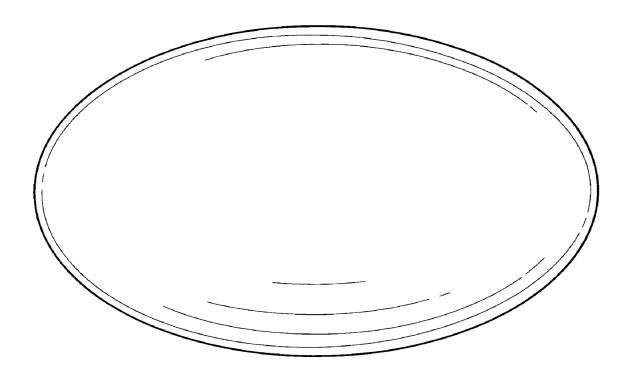


FIG. **6** 

**U.S. Patent** Jul. 21, 2009 Sheet 7 of 7

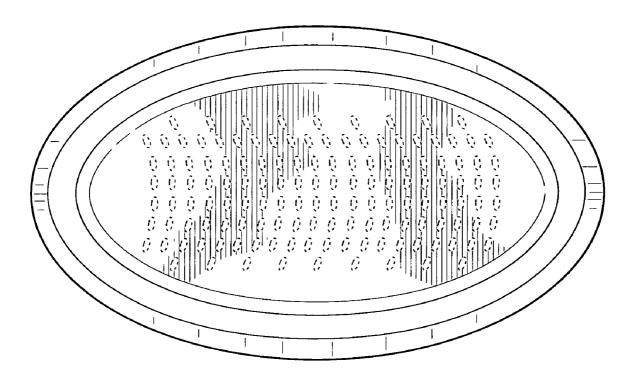


FIG. 7

# **EXHIBIT C**

The United States of America

# CERTIFICATE OF REGISTRATION PRINCIPAL REGISTER

The Mark shown in this certificate has been registered in the United States Patent and Trademark Office to the named registrant.

The records of the United States Patent and Trademark Office show that an application for registration of the Mark shown in this Certificate was filed in the Office; that the application was examined and determined to be in compliance with the requirements of the law and with the regulations prescribed by the Director of the United States Patent and Trademark Office; and that the Applicant is entitled to registration of the Mark under the Trademark Act of 1946, as Amended.

A copy of the Mark and pertinent data from the application are part of this certificate.

To avoid CANCELLATION of the registration, the owner of the registration must submit a declaration of continued use or excusable non-use between the fifth and sixth years after the registration date. (See next page for more information.) Assuming such a declaration is properly filed, the registration will remain in force for ten (10) years, unless terminated by an order of the Commissioner for Trademarks or a federal court. (See next page for information on maintenance requirements for successive ten-year periods.)



John (Ool)

Acting Director of the United States Patent and Trademark Office

Int. Cl.: 8

Prior U.S. Cls.: 23, 28 and 44

Reg. No. 3,633,750 Registered June 9, 2009

United States Patent and Trademark Office

### TRADEMARK PRINCIPAL REGISTER



INTERNATIONAL EDGE, INC. (NEW JERSEY CORPORATION)
79 TWO BRIDGES ROAD
FAIRFIELD, NJ 07004

FOR: PEDICURE IMPLEMENTS, NAMELY, FOOT FILES, IN CLASS 8 (U.S. CLS. 23, 28 AND 44).

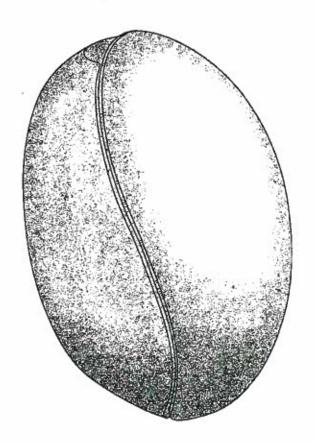
FIRST USE 10-29-2007; IN COMMERCE 10-29-2007.

THE MARK CONSISTS OF THE CONFIGURATION OF A FOOT FILE IMPLEMENT, SPECIFICALLY, THE ENTIRE IMPLEMENT.

SEC. 2(F).

SER. NO. 77-358,414, FILED 12-21-2007.

TRACY CROSS, EXAMINING ATTORNEY



# **EXHIBIT D**



# **EXHIBIT E**

#### Certificate of Registration Document 22 Filed 08/11/09 Page 37 of 52



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records

Marybeth Geters

Register of Copyrights, United States of America

Registration Number

VA 1-629-218

Effective date of registration

November 2, 2007

Title —				350
Title of Work		PED EGG Packaging Product packaging with text and images		
		October 18, 2007	Nation of 1st Publication	United States
Author -	(4/)	•	2 (4)	
	<ul><li>Author</li></ul>	International Edge Inc		127
	Author Created	2-Dimensional artwork, P	hotograph, Text	5
	Work made for hire:	Yes		
	Citizen of	United States	-Domiciled in.	United States
-	Anonymous.	No	Pseudonymous:	-No
Copyrigh	t claimant		<del></del>	
	Contain Cainnin.	The introduction Filter.		
	- • • •	79 Two Bridges Road, Fai	rfield, NJ, 07004	-
Limitatio	n of copyright cla		· · · · · · · · · · · · · · · · · · ·	
	Previously registered	No ]		
Certification -		<u> </u>		
	· Name:	Peter D Murray		. 5
	Date.	· ·		
			•	-

## Gently Removes Callous, Dry Skin

Original For Smooth, Beautiful Skin

Professional

The Ultimate Foot File /

Includes 2 Emery Finishing Pads!

- Over 150
   Precision Micro Files
- Safe To The Touch
- Ergonomic Design
- Traps Shavings No Mess

U. S. and Worldwide Patents Pending

#### Gently Removes Callous, Dry Skin

For Smooth, Beautiful Feet





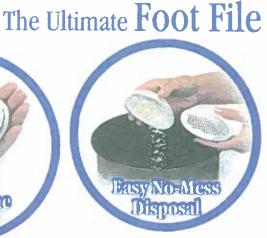
• Safe To The Touch

• Ergonomic Design

• Traps Shavings—No Mess

• Includes 2 Emery Finishing Pads





So dentle, World Burst The Balloon!

Comfortable, Ergonomic Design Over 150 Stainless Steel Micro Files

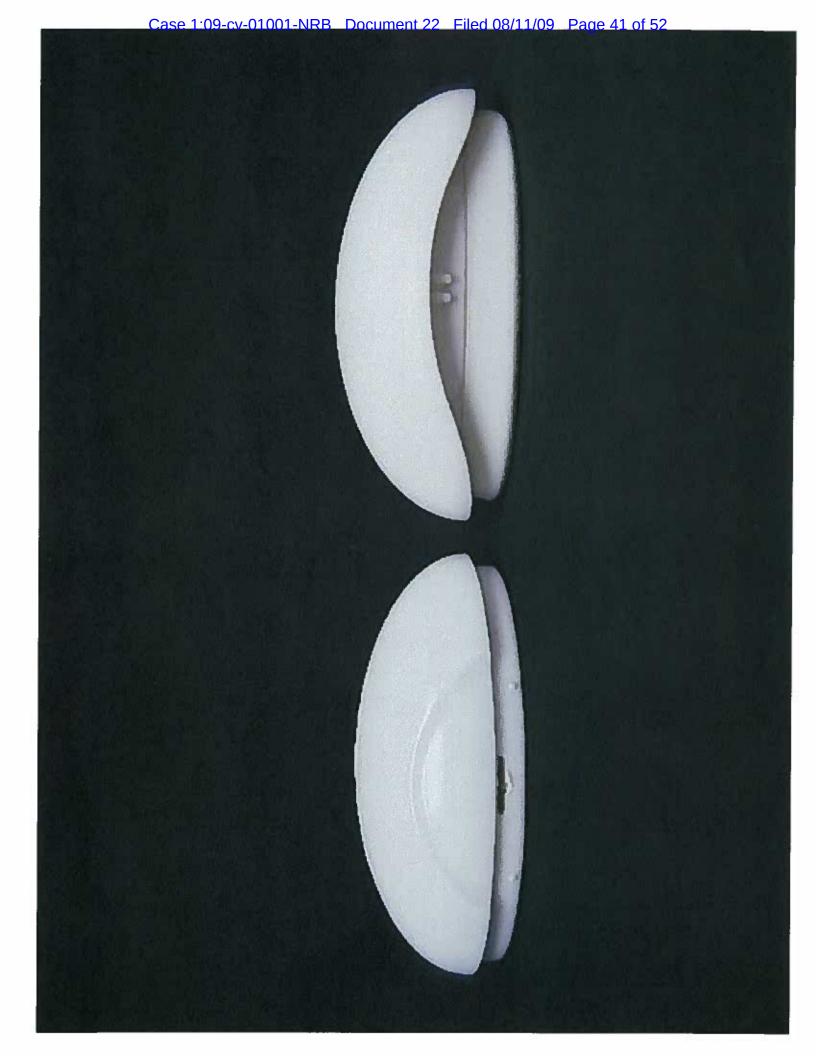
> No Mess -Collects Shavings

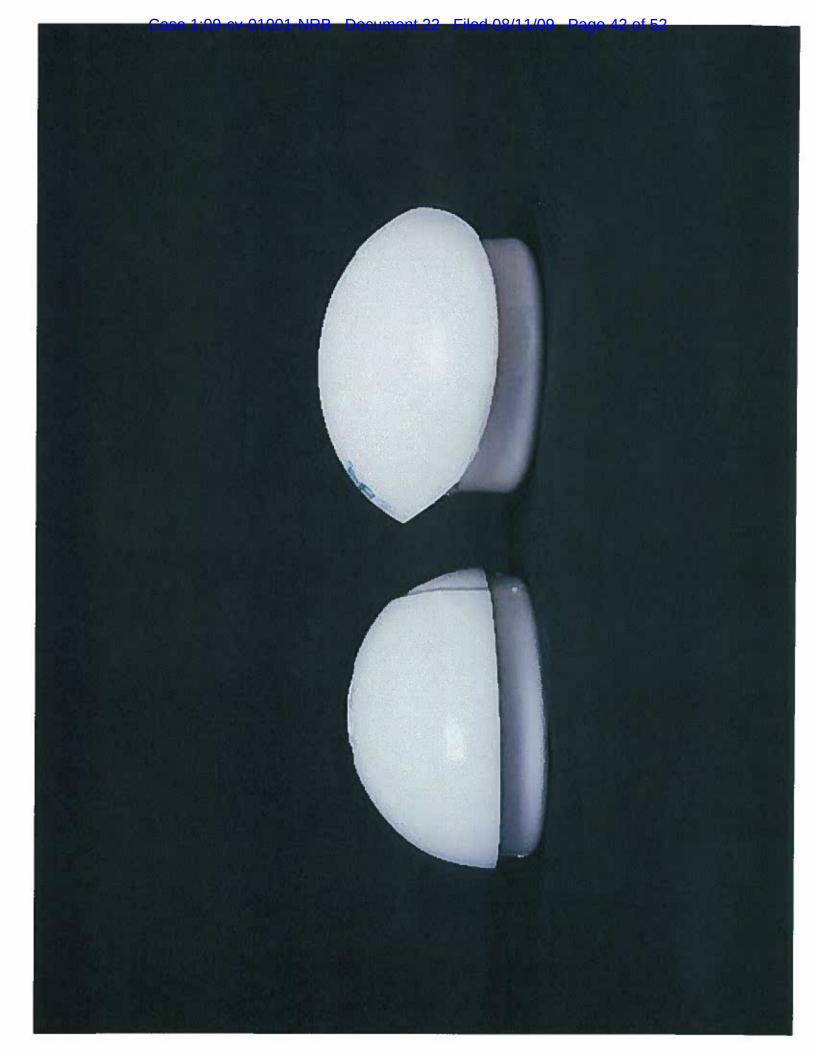
U.S. and Worldwide Patents Pending

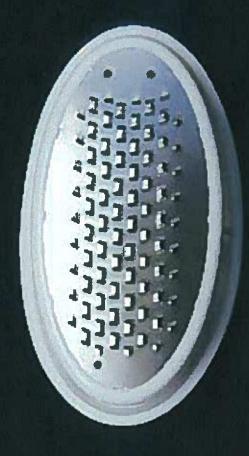
The original PedEgg is the revolutionary foot file that you've seen nationally advertised on TV. This enhanced professional version has been precision engineered with over 150 stainless steal micro files to gently remove calluses and dead skin to give your feet the incredible baby soft look and feel that everybody loves. Two high quality emery buffing pads have been included for the ultimate finishing touch

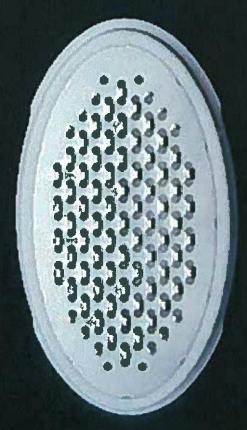
The unique "egg" shape of the PedPgg not only looks great, but is ergonomically designed to fit perfectly into the palm of your hand for easy and convenient use. Best of all, PedEgg has been designed to collect all the skin shavings in a convenient storage compartment allowing you to use it anywhere with no mess. You and your feet will love the new PedEgg!

### **EXHIBIT F**









# **EXHIBIT G**





#### **EXHIBIT H**

Premium Manicure & Grooming Tools

**EYE CARE** 

**FOOT CARE** 

**NAIL CARE** 

**GROOMING** 

PRODUCT SEARCH

**WHAT'S NEW FIND A RETAILER** MY SHOPPING LIST **GUARANTEE** 

CONTACT

AS SEEN

LOOK FOR OUR ADS IN YOUR

FAVORITE MAGAZINES.



#### **TOENAIL NIPPERS**







Toenail Nippers - Heavy Duty

Pedicure Nippers - Adjustable Ingrown Toenail Nipper and File



**Toenail Nippers TOENAIL CLIPS** 



**Swivel Toenail Clip** 



Clip & Catch Toenail Clip



Classic Toenaii Clip



**Comfort Curve Toenall Clip PEDICURE** 



**Smooth-It Foot Wand** 



**Toenall Spacers** 



Pedicure Stone - Dual-Grit



Premium Manicure & Grooming Tools

**EYE CARE** 

**FOOT CARE** 

**NAIL CARE** 

**GROOMING** 

PRODUCT SEARCH

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**Crystal Nail File** 



Sapphire File - Compact



**Diamond Cut Nail File** 



Sapphire File **MANICURE SCISSORS** 



**Cuticle Scissors - Classic Point** 



**Cuticle Scissors - Ultra-Fine Point** 



**Cuticle Scissors - Angled** 



**Nail Scissors NIPPERS** 



**Nail & Cuticle Scissors** 



Nail & Hangnail Scissors







Cuticle Nippers - Half Jaw

Nail Nipper - Fine Tip

**Nail Nippers - Heavy Duty** 



**Cuticle Nippers - Full Jaw** 



**Travel Size Cuticle Nipper** 



**Cuticle Nippers - Scissors** Action





Classic Nail Clip - Wide Blade



Comfort Curve Nall Clip



**Swivel Nail Clip** 



Clip & Catch Nail Clip **EMERY BOARDS** 



Triple Strong Nail Boards - Hard Nails



Triple Strong Nail Boards -Fragile Nails



Triple Strong Nail Boards -**Normal Nails** 



**Emery Boards - Compact** 



**Emery Boards - Full Length** 



Salon Board - Black



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